

1 THE HONORABLE RICARDO S. MARTINEZ  
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10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON  
12 SEATTLE DIVISION

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14 NW MONITORING LLC, a Delaware  
15 limited liability company,

16 Plaintiff,  
17 v.  
18

19 SUSAN L. HOLLANDER, et al.

20 Defendants.

21 No. 3:20-cv-05572-RSM

22 SECOND STIPULATED MOTION AND  
23 ORDER REGARDING DISCOVERY AND  
24 FED. R. CIV. P. 26(f) DEADLINES

25 Noting Date: April 28, 2021

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27 **SECOND STIPULATED MOTION REGARDING DISCOVERY**  
28 **AND FED. R. CIV. P. 26(f) DEADLINES**

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30 All Parties jointly file this Second Stipulated Motion Regarding Discovery and Fed. R. Civ.  
31  
32 P. 26(f) Deadlines.

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34 **BACKGROUND**

35  
36 Plaintiff filed their Complaint (Dkt. 1) on June 16, 2020. On June 23, 2020, the Court issued  
37 an Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement that set the  
38 deadline for the parties to conduct a Rule 26(f) conference as September 8, 2020; the deadline for  
39 initial disclosures as September 14, 2020; and the deadline for filing a Combined Joint Status Report  
40 under Rule 26(f) as September 21, 2020 (Dkt. 5).

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SECOND STIP. MOTION AND ORDER  
(NO. 3:20-CV-05572-RSM) – 1

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1 On or around August 12, 2020, Defendants Jeffery D. Parkinson, 4319 Consulting, Inc., and  
2 the Marital Community of Parkinson (defendants Parkinson) filed a Motion to Dismiss the complaint  
3 (Dkt. 13).

4  
5 On August 20, 2020, Defendants Susan L. Hollander and the Marital Community Comprised  
6 of Susan L. Hollander (defendants Hollander) filed a Motion for Partial Dismissal of Plaintiff's  
7 Complaint and joined in Defendant Parkinson's motion to dismiss (Dkt. 16).

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9 On August 21, 2020, Defendant Charlene Wolfe (defendant Wolfe) filed a Joinder to the  
10 Motion to Dismiss and Partial Motion to Dismiss (Dkt. 17 and 18).

11  
12 On September 8, 2020, pursuant to an agreed request of counsel in light of the pending  
13 motions to dismiss, the Court continued the deadlines 45 days.

14  
15 On October 16, 2020, the Court granted the parties' Stipulated Motion and Order Regarding  
16 Discovery and Fed. R. Civ. P. 26(f) Deadlines (Dkt. 25). The Order set the following deadlines:

- 16 1. The deadline for the parties to conduct a Rule 26(f) conference shall be  
17 continued to the later of December 15, 2020, or fourteen (14) days after the  
18 Court issues a ruling on Defendants' Motions to Dismiss, if anything  
19 remains of the action at that time.
- 20 2. The deadline for the Defendants to file their respective Answers to the  
21 Complaint shall be twenty (20) days after the Court issues a ruling on  
22 Defendants' Motions to Dismiss.
- 23 3. The deadline for the parties to exchange initial disclosures shall be  
24 continued to seven (7) days after the continued Rule 26(f) conference  
25 deadline.
- 26 4. The deadline for the parties to submit a Joint Status Report to the Court  
27 shall be continued to fourteen (14) days after the continued Rule 26(f)  
28 deadline.

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30 On April 15, 2021, the Court entered an Order granting in part and denying in part  
31 Defendants' motions to dismiss, and granted Plaintiff NW Monitoring LLC leave to amend its  
32 complaint within 21 days of the Order (Dkt. 26).

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SECOND STIP. MOTION AND ORDER  
(NO. 3:20-CV-05572-RSM) – 2

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1 Except as set forth above, no other pre-trial deadlines have been requested to date.  
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## MOTION

5 As currently set, the case schedule contemplates the parties conducting their Rule 26(f)  
6 conference, and Defendants filing their answers, prior to the deadline for Plaintiff to amend its  
7  
8 complaint. For efficiency, and pursuant to Local Rule 7(d)(1), the parties jointly move that the  
9  
10 Court enter an order as follows:  
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13 1. The deadline for the parties to conduct a Rule 26(f) conference shall be continued to  
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15 fourteen (14) days after all Defendants have filed their Answers to the Complaint or Amended  
16  
17 Complaint.  
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20 2. The deadline for the parties to exchange initial disclosures shall be continued to seven  
21  
22 (7) days after the continued Rule 26(f) conference deadline.  
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24

25 3. The deadline for the parties to submit a Joint Status Report to the Court shall be  
26  
27 continued to fourteen (14) days after the continued Rule 26(f) deadline.  
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29

30 DATED April 28, 2021.

YOUNGLOVE & COKER, P.L.L.C.

34  
35 s/Gregory M. Rhodes  
36 GREGORY M. RHODES, WSBA #33897  
37 Attorney for Defendant Wolfe

38 DATED April 28, 2021.

40 PERKINS COIE, LLP

42  
43 s/Christian W. Marcelo  
44 CHRISTIAN W. MARCELO, WSBA #51193  
45 DAVID A. PEREZ, WSBA #43959  
46 Attorneys for Defendants Parkinson and 4319  
47 Consulting, Inc.  
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SECOND STIP. MOTION AND ORDER  
(NO. 3:20-CV-05572-RSM) – 3

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DATED April 28, 2021.

## BEAN LAW GROUP

s/Matthew J. Bean

MATTHEW J. BEAN, WSBA #23221  
CODY FENTON-ROBERTSON, WSBA #47879  
Attorneys for Defendants Hollander, M.D.

DATED April 28, 2021.

ZEHNDER LAW LLP

s/John E. Zehnder

JOHN E. ZEHNDER, WSBA #29440  
JOSEPH P. ZEHNDER JR., WSBA #28404  
Attorneys for Plaintiff NW Monitoring LLC

## ORDER

Pursuant to Stipulated Motion, IT IS SO ORDERED.

DATED this 29<sup>th</sup> day of April, 2021.

Ricardo S. Martinez  
RICARDO S. MARTINEZ  
CHIEF UNITED STATES

SECOND STIP. MOTION AND ORDER  
(NO. 3:20-CV-05572-RSM) - 4

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that on April 28, 2021, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record:

John E. Zehnder, Jr., WSBA #29440 johnz@zehnderllp.com Joseph P. Zehnder, WSBA #28404 joez@zehnderllp.com Zehnder Law LLP 6625 Wagner Way NW, Suite 203 Gig Harbor, WA 98335 Phone: 253-235-3536 Fax: 253-276-6700  Attorneys for Plaintiff NW Monitoring LLC	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> E-File <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery
Cody Fenton-Robertson, WSBA #47879 cody@beanlawgroup.com Matthew J. Bean, WSBA #23221 matt@beanlawgroup.com Bean Law Group 2200 Sixth Avenue, Suite 500 Seattle, WA 98121-1843 Phone: 206-522-0618 Fax: 206-524-3751  Attorneys for Defendant Susan L. Hollander	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> E-File <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery
Gregory M. Rhodes, WSBA #33897 grhodes@ylclaw.com Younglove & Coker 1800 Cooper PT RD SW, Suite 16 Olympia, WA 98507 Phone: 360-357-7791 Fax: 360 754-9268  Attorney for Defendant Charlene Wolfe	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> E-File <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery

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4 DATED this 28th day of April, 2021.  
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*/s/ Christian W. Marcelo*

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Attorney for Defendants

JEFFERY PARKINSON and his

COMMUNITY PROPERTY, and 4319

CONSULTING, INC.

CERTIFICATE OF SERVICE (NO. 3:20-CV-05572-RSM) – 2

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